

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RADHIKA VEGESNA, Personal
Representative of the ESTATE
OF RAJESH PADMARAJU, Deceased
Plaintiff

VS.

NO. 03-295 ERIE

ISD TRANSPORTATION COMPANY,
INC., MANDEEP SINGH, SAMINDER
SINGH, and SAMINDER SINGH,
d/b/a ISD TRANSPORTATION
COMPANY, INC., Defendants

RADHIKA VEGESNA, Personal
Representative of the ESTATE
OF RAJESH PADMARAJU, Deceased
Plaintiff

VS.

NO. 03-317 ERIE

SAMINDER SINGH and SAMINDER
SINGH, d/b/a ISD
TRANSPORTATION COMPANY, INC.,
Defendants

PLAINTIFF'S SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT, MANDEEP SINGH

AND NOW comes the Plaintiff, RADHIKA VEGESNA, Personal Representative of the ESTATE OF RAJESH PADMARAJU, Deceased, by her counsel, ANDREW J. CONNER of CONNER RILEY & FRYLING, 17 West Tenth Street, P.O. Box 860, Erie, Pennsylvania 16512-0860, and submit the following Supplemental Requests for Production of Documents upon the Defendant, ISD TRANSPORTATION COMPANY, INC., requiring responses within thirty (30) days after service in accordance with Rule 34 of the Federal Rules of Civil Procedure, as follows:

2) Please produce and permit inspection and copying of all writings, memorandums, documents, files and other compilations of data and information, which information can be obtained and which information is in the possession, custody and control of Defendant, with the exception of any portions thereof which would disclose the mental impressions of his attorneys, their conclusions, opinions, memorandum, notes or summaries, legal research or legal theories and with the exception of any portions thereof which would disclose the mental impressions, conclusions or opinions reflecting the value or merit of a claim or defense or respective strategy or tactics of a representative of Defendant, other than attorney, which relate to the subject matter involved in this action including, but not limited to:

(a) True and complete copies of 2000 and 2001 U.S. Tax returns with applicable W-2s and 1099s;

RESPONSE:

(b) If not provided in response to (b), above, copies of all 2000 and 2001 W-2s and 1099s received by Mandeep Singh From ISD, Watson and any other companies or entities which employed Mandeep Singh as a tractor-trailer operator;


RESPONSE:

(c) Copies of the instructional booklets and documents, made reference to by Mandeep Singh in his April 15, 2002 deposition, received by Mandeep Singh from Watson regarding Mandeep Singh's training and education to obtain a Commercial Driver's License in 2000.

RESPONSE:

Respectfully submitted,

CONNER RILEY & FRYLING

BY 
ANDREW J. CONNER, ESQUIRE
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DATED: April 25, 2005.